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13 UNITED STATES DISTRICT COURT

14 DISTRICT OF ARIZONA

15 In Re Bard IVC Filters Products  
16 Liability Litigation

17 No. MD-15-02641-PHX-DGC

18 **NOTICE OF LODGING EXHIBITS  
19 RELATED PLAINTIFFS' OPPOSITION  
20 TO DEFENDANTS' MEMORANDUM  
21 TO SEAL DOCUMENTS LODGED  
22 UNDER SEAL IN SUPPORT OF  
23 PLAINTIFFS' OMNIBUS SEPARATE  
STATEMENT OF FACTS IN SUPPORT  
OF PLAINTIFFS' RESPONSES TO  
DEFENDANTS' MOTIONS FOR  
SUMMARY JUDGEMENT IN THE  
BELLWETHER CASES**

24 Pursuant to LRCiv 5.6(d), Plaintiffs submits this Notice of Lodging Exhibits Under  
25 Seal Related to Plaintiff's Opposition to Defendants' Memorandum to Seal Documents  
26 Lodged Under Seal In Support of Plaintiffs' Omnibus Separate Statement of Facts in  
27 Support of Plaintiffs' Responses to Defendants' Motions for Summary Judgment in the  
Bellwether Cases.

28 Plaintiffs provide notice that, pursuant to LRCiv 5.6(d), they have lodged with the  
Court under seal two exhibits to their Opposition, Exhibits A and B: Exhibit A, Chart of  
Documents and Testimony Bard Seeks to Redact and Exhibit B, Chart of Documents and  
Testimony Bard Seeks to Seal in their Entirety.

1 Defendants contend that the documents contained in the exhibits are confidential  
2 and should be filed under seal. Plaintiff does not believe that the disputed documents  
3 warrant continued confidential treatment as proprietary or sensitive trade secret  
4 information.

5 RESPECTFULLY SUBMITTED this 17<sup>th</sup> day of November, 2017.

6 GALLAGHER & KENNEDY, P.A.  
7

8 By:/s/ Mark S. O'Connor  
9

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20 **CERTIFICATE OF SERVICE**

21 I hereby certify that on this 17<sup>th</sup> day of November 2017, I electronically transmitted  
22 the attached document to the Clerk's Office using the CM/ECF System for filing and  
23 transmittal of a Notice of Electronic Filing.

24 /s/ Gay Mennuti  
25